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action against a corporation to recover moneys wrongfully paid to stockholders out of the capital as dividends, a plea that a committee appointed to investigate the matter reported such action unnecessary, and that at a meeting of the stockholders the majority voted against such action, was held, by the Court of Errors and Appeals of New Jersey, in the case of *Siegman v. Electric Vehicle Co.*, 65 Atlantic Reporter, 910, to state no defense. The court said that the violation of the New Jersey statutes on this subject affected not only the rights of the stockholders, but also those of the creditors, and that, even if it could be sanctioned by unanimous vote, this could not take away the right of the public to be not misled as to the actual corporate assets.

Change of Statute of Limitations.—The Supreme Judicial Court of Massachusetts, in *Mulvey v. City of Boston*, 83 Northeastern Reporter, 402, held that a change by the Legislature of the statute of limitations from six years to two, allowing 30 days in which to bring actions for personal injuries against cities, which accrued more than two years before, is not unconstitutional, and that in a small state like Massachusetts, where means of communication are so adequate, an allowance of 30 days is a reasonable time in which to bring an action which would be barred by the change.

Injuries to Automobile from Defects in Highway.—A railroad company, in reconstructing a highway, had filled its bed with two or three feet of sand, in which plaintiff's automobile became stuck while passing over. Assistance was necessary to disengage the car, which, while being extricated, was injured. Action was then instituted for damages. In *Doherty v. Town of Ayer*, 83 Northeastern Reporter, 677, the Supreme Judicial Court of Massachusetts held that a statute, enacted more than 100 years ago, providing that highways should be kept in repair at the expense of the city or town, so as to be reasonably safe and convenient for travelers with carriages, could not reasonably be construed to embrace heavy machines like modern automobiles, as this would put towns in sparsely settled districts under enormous expense in the maintenance of highways.

Illegal Consideration.—A note was given in consideration of release of liability and dismissal of suit on another note, the consideration of which was the transfer of a liquor license in violation of law. In *Kennedy v. Welch*, 83 Northeastern Reporter, 11, the Supreme Judicial Court of Massachusetts held that illegality permeated the entire transaction; and, the first note being invalid, the dismissal of an action on it furnished no valid independent consideration for the new note.